

LAW OFFICES

CHASAN LEYNER & LAMPARELLO

A PROFESSIONAL CORPORATION

300 HARMON MEADOW BOULEVARD  
SECAUCUS, NEW JERSEY 07094-3621  
TEL. (201) 348-6000  
FAX (201) 348-6633  
WWW.CHASANLAW.COM

COUNSEL

JOEL A. LEYNER<sup>Δ\*○</sup>  
ARTHUR N. D'ITALIA

OF COUNSEL

HERBERT KLITZNER  
JOSEPH M. ANDRESINI  
ROBERT M. CZECH  
MICHAEL A. D'ANTON, PH.D.<sup>▽</sup>

RAYMOND CHASAN  
(1904-1988)

October 2, 2009

RALPH J. LAMPARELLO<sup>Δ\*+○</sup>  
ROBERT A. KAYE<sup>Δ</sup>  
CINDY NAN VOGELMAN  
JOHN V. MALLON<sup>○\*</sup>  
STEVEN L. MENAKER<sup>++</sup>  
THOMAS R. KOBINA  
ROBERT A. CAPPUZZO<sup>Δ</sup>  
JOHN L. SHAHDANIAN II<sup>Δ</sup>  
ANTHONY V. D'ELIA  
MITZY GALIS-MENENDEZ  
PATRICK J. ARRE<sup>\*\*+○</sup>  
JOHN P. BEIRNE  
MICHAEL D. WITT<sup>⊕</sup>

KIM R. ONSDORFF<sup>○</sup>  
JORDAN S. FRIEDMAN<sup>Δ</sup>  
THOMAS A. MORRONE<sup>+</sup>  
ANN M. MERRITT<sup>⊎</sup>  
PETER L. MACISAAC  
NICOLE R. CASSATA  
MICHAEL A. CASSATA  
JOSEPH A. GARCIA<sup>Δ</sup>  
MARK S. HANNA<sup>Δ</sup>  
JOSE VILARIÑO  
ROOSEVELT JEAN  
KIRSTIN BOHNA  
JOSEPH A. LAGANA  
JOHN M. TUNTEVSKI<sup>Δ</sup>  
RICHARD W. FOGARTY<sup>Δ</sup>  
MARIA P. VALLEJO  
RAYMOND J. SEIGLER  
ROBERT E. FINNA  
JOSEPH CATENARO

Δ N.J. & N.Y. BARS  
○ N.J. & PA. BARS  
▽ N.J. & D.C. BARS  
⊕ N.J., N.M. & KS. BARS  
⊎ N.J. & FL. BARS

\* CERTIFIED CIVIL TRIAL ATTORNEY  
+ CERTIFIED CRIMINAL TRIAL ATTORNEY  
○ RULE 1:40 QUALIFIED MEDIATOR

By ECF

Honorable Lois H. Goodman, U.S.M.J.  
Clarkson S. Fisher Federal Building  
402 East State Street, Room 6052  
Trenton, New Jersey 08608

Re: Torres-Hernandez and Ramirez v. CVT Prepaid Solutions  
Docket No. 3:08-cv-1057-FLW-TJB  
File No. 13499-1837

Dear Judge Goodman:

Together with the law firm of Shefsky & Froelich Ltd., we represent the defendant CVT Prepaid Solutions, Inc. (CVT). During an August 28, 2009 status conference we advised the Court and counsel of CVT's intention to file a petition for voluntary bankruptcy under Chapter 7 of the United States Bankruptcy Code. In an Order memorializing that conference, the Court directed CVT to provide a status report which we now do.

I am informed by co-counsel Bart O'Brien, Esq. of Shefsky & Froelich that: CVT is working with separate bankruptcy counsel to prepare the necessary documents and schedules required to support the petition; filing of the bankruptcy petition is complicated and delayed by the recent decision to file separate Chapter 7 bankruptcies for two wholly-owned CVT subsidiaries; and, the filing of these bankruptcies will occur at the same time as CVT files its bankruptcy petition.

Under these circumstances, CVT requests that this Court continue to stay discovery pending further order of the Court and proposes providing the Court with a status report on or before November 2, 2009.

Honorable Lois H. Goodman, U.S.M.J.  
October 2, 2009  
Page 2

We thank you for your consideration and await your advice.

Respectfully yours,

*/s/ Steven Menaker*  
Steven Menaker  
For the Firm

SM:mr

c: All counsel of record by ECF